

EXHIBIT 2

Miller, Barry

From: Philip Gordon <pgordon@gordonllp.com>
Sent: Tuesday, October 02, 2012 8:16 PM
To: Miller, Barry
Subject: Reyes v. SJ Services

Barry, I write this email to you in the hopes that we can avoid unnecessary motion practice, by your client withdrawing this complaint from Federal Court and remanding it to State Court. The complaint is not properly before the court, because we never served it on you or your client, or even sent it to you. As you and I have discussed, this is important because it was our client's intention to serve an amended complaint on your client. When you called me in August, you told me that you had heard about the complaint and had been engaged by SJ Services (and Shawn and David Shea), and that you would accept service of the complaint when we were ready. MRCP Rule 4(j) permits service of a complaint within 90 days of filing, and MRCP Rule 15 permits amendment of pleading at any time as a matter of right before a responsive pleading is served. But you removed the complaint before it was served. Nevertheless, it remains my clients' right to serve the complaint (and amend it as I had indicated to you), and no action may be taken by your client on that complaint until then. Thus, I will move to remand the complaint to Superior Court, so that it may be amended and served. At that point, you may seek to remove the case, if you so choose and still believe it is subject to removal. In the meantime, I must also move on an emergency basis for a stay of your Motion to Dismiss pending the Court's decision on my Motion to Remand. Of course, we can avoid both such motions if your client agrees to withdraw the complaint and remand the case to Superior Court. Please let me know how you wish to proceed. -Phil

Philip J. Gordon, Esq.

Managing Partner
Gordon Law Group, LLP
585 Boylston Street
Boston, MA 02116

www.gordonllp.com
Ph. 617-536-1800
Fax 617-536-1802

CONFIDENTIALITY: This e-mail message and any attachments are confidential and may be privileged. If you are not the designated recipient, you may not review, copy or distribute this message. If you received this message in error, please notify Gordon Law Group, LLP immediately -- by replying to this message -- and destroy all copies of this message and any attachments. Thank you.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (including any attachments) is **NOT** intended or written to be used, and cannot be used, for the purpose of either: avoiding penalties under the Internal Revenue Code; or promoting, marketing or recommending to another party any transaction or matter addressed herein.